

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

NO. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FEDERICO CERETTI, ET AL.

Defendants.

Adv. Pro. No. 09-1161 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND TO FOURTH AMENDED  
COMPLAINT**

Upon the request of defendant Citi Hedge Fund Services Ltd., (“Citi Hedge”), by and  
through its undersigned attorneys, for a further extension of time beyond September 19, 2014, as

provided in the “Stipulation Extending Time To Respond To Fourth Amended Complaint And Setting Date For Pre-Trial Conference” [Doc. #107]; and the respective counsel for the Trustee and Citi Hedge having conferred; it is hereby stipulated and agreed by and between the undersigned herein:

The deadline by which Citi Hedge may move, answer or otherwise respond to the Fourth Amended Complaint is extended from September 19, 2014, up to and including October 17, 2014.

Nothing in this Stipulation is a waiver of Citi Hedge’s rights to request from the Court a further extension of the deadline set forth above, and/or the Trustee’s right to object to any request.

Undersigned counsel for Citi Hedge expressly represent: (i) service of the Summons and Complaint in the above-captioned adversary proceeding was properly effected upon them, and (ii) they have the authority to, and hereby waive any defenses based on insufficiency of process or insufficiency of service of process of the Summons and Complaint on behalf of Citi Hedge.

The parties to this Stipulation agree that entering into this Stipulation does not constitute submission by Citi Hedge to the jurisdiction of this Court and, except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including to challenge the jurisdiction of the Court in this Court or any other court.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental

Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences  
(ECF No. 7037) in the above-captioned case (No. 08-01789 (SMB)).

Dated: September 2, 2014  
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Geraldine E. Ponto  
Email: [gponto@bakerlaw.com](mailto:gponto@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Estate of Bernard L.  
Madoff*

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By: /s/ Carmine Boccuzzi  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 224-2000  
Facsimile: (212) 225-3999  
Carmine Boccuzzi  
Email: [cboccuzzi@cgsh.com](mailto:cboccuzzi@cgsh.com)  
James W. Doggett  
Email: [jdoggett@cgsh.com](mailto:jdoggett@cgsh.com)

*Attorneys for Defendant Citi Hedge Fund  
Services Ltd.*